

**KENTUCKY POWER COMPANY**

**CASE NO. 2014-00396**

**Response to KPC Request For Information  
To The Kentucky School Boards Association**

**Question No. 1**

**Responding Witness: Ronald Willhite**

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Willhite in electronic format, with formulas intact and visible, and no pasted values.

**Response:**

See attachments

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**Question No. 2**

**Responding Witness: Ronald Willhite**

2. Please provide all work papers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Willhite. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

**Response:**

Provided in response to Question 1.

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**Question No. 3**

**Responding Witness: Ronald Willhite**

3. Please reference page 5, lines 12 through 14, of the testimony of Mr. Willhite. Please quantify the "significant emissions reductions and monetary savings" resulting from the School Energy Managers Program ("SEMP") that Mr. Willhite references.

**Response:**

\$48,000,000

234,000 metric tons CO2

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### Question No. 4

#### Responding Witness: Ronald Willhite

4. Please provide separately by school districts in Kentucky Power's service territory the emission reductions and energy savings resulting from the SEMP. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

#### Response:

Below is the requested information for KPC served districts that reported data pursuant KRS160.325 for all years from FY2010 through FY2014. Also shown are the results in total for the twenty-three served KPC districts.

Reductions over FY2010 base through FY2014		
Full Reported Data	KWH	CO2 Metric Tons
Ashland	1,594,141	1,099.24
Boyd	13,622,448	9,393.37
Breathitt	1,585,750	1,093.46
Carter	4,031,401	2,779.86
Fairview	(780,980)	(538.53)
Floyd	1,961,653	1,352.66
Greenup	2,285,548	1,576.00
Hazard	4,159,088	2,867.90
Jackson Ind	53,334	36.78
Johnson	4,429,468	3,054.34
Lawrence	7,388,860	5,095.00
Letcher	6,415,721	4,423.97
Perry	5,401,551	3,724.65
Pike County	3,906,319	2,693.61
Raceland-Worthington	1,479,522	1,020.21
Russell Ind	4,232,902	2,918.80

<b>Sub Total</b>	61,766,726	42,591.31
<b>Incomplete Reporting *</b>		
Jenkins		
Knott		
Leslie		
Magoffin		
Martin		
Paintsville		
Pikeville		
Jenkins		
Knott		
<b>Combined Reporting Total*</b>	69,978,937	48,254.05

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**Question No. 5**

**Responding Witness: Ronald Willhite**

5. Please reference page 8, line 25, of the testimony of Mr. Willhite and Kentucky Power's peak days as shown on page 401b of the Company's FERC Form 1 for the years 2009-2014.

- a. Please identify which of the peak days on page 401b of the Company's FERC Form 1 for the years 2009-2014 were days where school was not in session and which districts were not in session.

For those days identified in response to part (a), please identify whether the school was closed for both students and teachers or if teachers and staff were present but students were not (i.e. an in-service day).

**Response:**

Please refer to the below Kentucky Department of Education site for the requested information:

<http://education.ky.gov/districts/enrol/Pages/School-Calendar.aspx>

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**Question No. 6**

**Responding Witness: Ronald Willhite**

6. Please reference page 8, lines 34-41 of Mr. Willhite's testimony. Please provide a cost of service study for rate LGS and school accounts based upon Mr. Willhite's proposed demand method that recognizes that KPC must capacity plan based on its expected winter peak.

- a. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values. Please identify and provide all assumptions and inputs relied upon in making the calculations.
- b. Please provide copies of all source documents or other materials relied on by Mr. Willhite to support his contention that the "alternative method" referred to on line 39 of Mr. Willhite's would better conform with Mr. Stegall's criteria articulated at page thirteen of his testimony."

**Response:**

No cost of service study was performed. See attachments provided in response to Question.

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**Question No. 7**

**Responding Witness: Ronald Willhite**

7. Please refer to pages 8-9 of Mr. Willhite's testimony and his discussion of proposed Tariff LGS-School.

- a. Please provide a complete version of Mr. Willhite's proposed Tariff LGS-School, including all terms, conditions of service, and rates.
- b. Please provide all calculations used in computing the rates contained in Mr. Willhite's proposed Tariff LGS-School. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values. Please identify and provide all assumptions and inputs relied upon in making the calculations.

**Response:**

- a. Attached
- b. See attachments provided in response to Question 1.

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**Question No. 8**

**Responding Witness: Ronald Willhite**

8. Please identify all electric utilities in the Commonwealth that currently provide service in accordance with terms, conditions of service, and rates similar to those contained in Mr. Willhite's proposed Tariff LGS-School.

**Response:**

Some of the Kentucky distribution cooperatives (Cumberland Valley, Fleming Mason, Grayson, Licking Valley, Inter-County, South Kentucky and Jackson Energy) have All-electric School Service. Kentucky Utilities has Rate Schedule AES and DUKE Kentucky has Optional Space Heating Rate EH.

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**Question No. 9**

**Responding Witness: Ronald Willhite**

9. Please assume the Commission approves Mr. Willhite's proposed Tariff LGS-School.
- a. Is it Mr. Willhite's understanding that customers taking service under the proposed Tariff LGS-School would, as a class, pay less than they would if Tariff LGS-School is not approved?
  - b. Please provide the calculation of the effect on Kentucky Power's revenue requirement, as proposed by Kentucky Power in this case, if Mr. Willhite's Tariff LGS-School is approved and all members of KSBA taking service from Kentucky Power take service under the proposed Tariff LGS-School.
  - c. To which tariff classes should the foregone revenues resulting from the assumed approval of Tariff LGS-School be allocated?

**Response:**

- a. Yes
- b. See attachment
- c. Tariffs MGS and LGS